



**Environment Committee
Public Hearing
February 16, 2009**

Submitted by: Charles J. Rothenberger, Staff Attorney

In Opposition to:

Raised Bill No. 1084: An Act Expanding The Definition Of A Class I Renewable Energy Source To Include Biosludge or Biosolids

Connecticut Fund for the Environment ("CFE") is a non-profit environmental organization with over 6,500 members statewide. For more than twenty-five years, CFE has used law, science and education protect and preserve Connecticut's natural resources.

CFE opposes Raised Bill No. 1084, which would expand the definition of Class I renewable energy sources to include biosludge and biosolids.

Connecticut's Renewable Portfolio Standards (RPS) requires each electric supplier and each electric distribution company wholesale supplier to obtain at least 23% of its retail load from renewable energy by January 1, 2020. Twenty percent of that must come from "Class I" renewable energy sources and an additional three percent must come from either "Class I" or "Class II" renewable energy sources.

The current definition of a Class I renewable energy source includes solar, wind, fuel cells, landfill methane, ocean thermal, wave and tidal power, run-of-the-river hydropower and certain limited sustainable biomass operations, subject to strict emissions limits. The current definition of a Class II renewable energy source includes trash-to-energy facilities and certain general biomass operations.

CFE believes that it would be inappropriate to dilute the current definition of Class I renewable energy sources by including biosludge or biosolid facilities. The state's RPS should

(Testimony continues on reverse)

be encouraging the development and deployment of high-tech, emissions-free energy sources that will provide truly clean energy to the state's residents while spurring significant job creation and industry within the state. Solar, wind and fuel cells all hold out that promise, unlike biosolid facilities.

Moreover, the combustion or gasification of biosludge and biosolids would seem to more appropriately belong within the Class II renewable energy sources, being similar in nature to trash-to-energy and general biomass facilities. CFE also notes that the current definitions of both Class I and Class II renewable energy sources establishes emissions limits for nitrogen oxides per million BTU of heat input for biomass facilities in order to qualify as a renewable energy source. CFE recommends that, if the definition of Class II renewable energy is expanded to include biosludge or biosolids, an emissions standard be set to establish whether a biosludge or biosolid facility shall qualify as a Class II renewable energy source.

For the foregoing reasons, CFE opposes expanding the definition of Class I renewable energy sources to include biosludge and biosolids and urges the Committee to reject this proposal.